

**From:** McGuigan, David

**Sent:** Tuesday, November 04, 2014 11:07 AM

**To:** 'Mcdonnell, Lee'

**Cc:** Trulear, Brian; Kasi, Veronica; Furlan, Ronald; Furjanic, Sean; Gleason, Patricia; Walker, Dana; Capacasa, Jon; Gable, Kelly

**Subject:** RE: NPDES documents related to lifting Bay permit objections

Lee, Nicki, Ron and Sean,

Thank you for the opportunity to review the package and the clarification conference call that we had last week. We have reviewed the documents provided and they reflect the agreed upon approach, and from this end you are good to go. With respect to lifting the objections, we can lift the objections upon their resubmission and after our review. From our discussions, this should not pose a problem. However, I would suggest that instead of submitting all the permits at the same time, that PaDEP consider sending us one permit and once we have conducted and expedited review, then the others could be submitted in bulk. This will avoid redraft of multiple permits if there are any issues identified, which should not be the case.

Really appreciate the submittal and we look forward to working with you. One outstanding issue is to establish a schedule and a PaDEP/Workgroup to accelerate and streamline development of the credit calculation tool. Perhaps we can discuss this at our November 25<sup>th</sup> meeting on Stormwater.

David

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**From:** Mcdonnell, Lee [<mailto:lmcdonnell@pa.gov>]

**Sent:** Friday, October 17, 2014 3:13 PM

**To:** McGuigan, David

**Cc:** Trulear, Brian; Kasi, Veronica; Furlan, Ronald; Furjanic, Sean

**Subject:** NPDES documents related to lifting Bay permit objections

David,

As we had discussed I am attaching a series of documents that should resolve the issues related to objections. Please review and let us know if you have any questions or concerns. I believe that I shared our rollout plan with you through previous correspondence. I would appreciate feedback by Friday October 24<sup>th</sup>. Should you have any questions, please contact us immediately.

I will be sending you 5 documents:

- Letter to significant Bay NPDES permit holders and all credit generators
- Updated wastewater supplement to the Phase 2 WIP
- New nutrient trading supplement to the Phase 2 WIP
- New Bay language to be used in Part C of any reissued permits
- Document showing website changes that correspond with both supplements

A few things to draw your attention too:

- The change for each permittee to start sampling 2/week will be incorporated for each permit upon renewal. We won't be able to do this effectively through our mass update (amendment) of permit language for those permit that have application due dates beyond March 1, 2015 (see the letter to permittees)
- We are going to use phase 4 delivery ratios until we get to phase 6 model changes and will incorporate phase 6 into our supplements
- We are planning on sending the letters on 11/6 in order to keep things on track

Please direct nutrient trading questions to Nicki, and permitting questions to Ron and Sean.

Thanks Lee

Lee A. McDonnell, P.E. | Director

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